

The Law Offices of  
ANDREW J. FRISCH, PLLC  
40 Fulton Street, 17<sup>th</sup> Floor  
New York, New York 10038  
212-285-8000

March 10, 2022

*Filed via ECF*

The Honorable Nicholas G. Garaufis  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

*Re: United States v. Douglass Mackey, Criminal Docket No. 21-0080 (NGG)*

Dear Judge Garaufis:

I write on behalf of Douglass Mackey to request a short extension of time within which to file a motion on his behalf for a bill of particulars from today until March 16, 2022. The government consents to this request. Needless to say, I will reciprocate and consent to any corollary request should the government require an adjustment of the briefing schedule (the government's opposition is currently due April 7, 2022) so it has adequate time to prepare its response.

Since the Court accepted my appearance as substitute counsel, I have substantially learned the case and continue to be in contact with the government to comply with Local Criminal Rule 16.1 in advance of filing my motion. The requested extension of time is necessary to finalize my papers and to assure ample time for Mr. Mackey to review my draft and contribute any input. Meanwhile, I have competing commitments in other matters, including oral argument on Monday in a case before Judge Korman, and I want to be sure that I afford adequate attention to Mr. Mackey and my other clients.

I appreciate the Court's consideration.

Respectfully submitted,

/s/ Andrew J. Frisch  
Andrew J. Frisch

cc: AUSA Erik Paulsen  
AUSA Olatokunbo Olaniyan  
AUSA William Gullotta